



December 9, 2024

**MEMO ENDORSED**

*By ECF*

The Honorable Katherine Polk Failla  
United States District Court for the Southern District of New York  
40 Foley Square, Courtroom 618  
New York, New York 10007

Re: *Dinosaur Financial Group LLC et al. v. S&P Global, Inc. et al.*, No. 22-cv-1860

**Subject: Sealing Request Regarding Plaintiffs' Response to Defendants' Motion for Discovery of Absent Class Members**

Dear Judge Failla:

We represent Plaintiffs Hildene Capital Management, LLC, Dinosaur Financial Group LLC, and Swiss Life Capital Management (collectively "Plaintiffs"). Plaintiffs are filing today their response to Defendants' motion for discovery of absent class members (ECF No. 140). Pursuant to the Protective Order (ECF No. 125) and Rule 9 of this Court's Individual Rules of Civil Procedure ("Rule 9"), Plaintiffs request permission to file their response in partially redacted form and seal the documents attached as exhibits to the response, except for Exhibit 5 ("Sealed Exhibits").

In accordance with Rule 9, Plaintiffs are filing: (i) a redacted version of their response to Defendants' motion with Sealed Exhibits; and (ii) a copy of the response with proposed redactions highlighted and exhibits in selected view. Pursuant to Rule 9.B.ii., Plaintiffs will also email Chambers with copies of these documents.

Plaintiffs' response and Sealed Exhibits contain, paraphrase or quote "Discovery Material" that has been designed as "Protected Material" by Defendant FactSet Research Systems Inc. ("FactSet") under the Protective Order. (ECF No. 125). The redacted portions of Plaintiffs' response and the Sealed Exhibits do not contain information concerning Plaintiffs, and Plaintiffs take no position on whether those documents should appropriately be deemed confidential. Plaintiffs are seeking permission to seal these materials to comply with the Protective Order and Rule 9. Plaintiffs reserve the right to challenge FactSet's confidentiality designations as appropriate.

Respectfully submitted,

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/s/ Leiv Blad  
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Cc: Counsel of record (*via ECF*)

Application GRANTED. The Clerk of Court is directed to maintain docket entry 143 under seal, viewable to the Court and the parties only.

The Clerk of Court is further directed to terminate the pending motion at docket entry 141.

Dated: December 11, 2024  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE